

FILED 22 AUG '17 15:12 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

3:17-CR- 00317-SI

v.

INDICTMENT

HOSSEIN HEYDARI,

18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i)

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Hossein Heydari, hereinafter referred to as defendant, was a resident of Gaithersburg, Maryland.
2. Oregon's Medicaid Management Information System (MMIS) is the marketplace for medical care providers, pharmacies, and patients to exchange eligibility information for care, prescriptions, and other benefits provided by Medicaid, and it is managed by the Oregon Health Authority (OHA).
3. The servers that hold the MMIS data are in Salem, Oregon.
4. Hewlett Packard Enterprises (HPE) provided system administrators and technical support for Oregon's MMIS. Hewlett Packard Enterprises operates the system, and OHA maintains the data and the servers holding the data.

5. Defendant worked for HPE and was assigned to Title 19 (Medicaid) computer management systems for Oregon and three other states. As part of his job duties, defendant had access to the servers that hold the MMIS data.

6. On or about October 14, 2016, HPE informed defendant that, as part of a work force reduction, his last day of employment would be October 28, 2016.

7. On or about October 31, 2016, defendant intentionally altered part of the MMIS system, causing it to fail and resulting in an 8-hour loss of functionality for Oregon's MMIS system and its users.

COUNT 1
(Fraud and Related Activity in Connection with Computers)
(18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i))

8. Paragraphs 1-7 of the Introductory Allegations are incorporated herein.

9. On or about October 31, 2016, in the District of Oregon and elsewhere, defendant knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to protected computers and such conduct caused:

- Loss to OHA and HPE, during the one-year period beginning on October 31, 2016, aggregating more than \$5,000 in one year;
- The impairment of the medical examination, diagnosis, treatment, or care of individuals; and
- A threat to public health.

All in violation of 18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i).

FORFEITURE ALLEGATION

(18 U.S.C. §§ 982(b)(1) and 1030(i))

10. The allegations contained in Count 1 of this Indictment are hereby alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 982(b)(1) and 1030(i)(1).

11. Upon conviction of Count 1 of this Indictment, a computer fraud offense in violation of 18 U.S.C. § 1030(a)(5)(A), defendant shall forfeit to the United States of America any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense and any personal property that was used or intended to be used to commit or to facilitate the commission of such offense, including a sum of money equal to the proceeds derived from or obtained as a result of such offense.

12. If the above-described property, as a result of any act or omission of defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

///

///

///

///

///

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and 1030(i)(1).


DATED this 22nd day of August 2017.

A TRUE BILL.


FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney


SCOTTE BRADFORD
Assistant United States Attorney